



THE MARITIME & PORT SECURITY INFORMATION SHARING & ANALYSIS ORGANIZATION

MPS-ISAO

September 8, 2017

Rear Admiral P. F. Thomas, U.S. Coast Guard
Assistant Commandant for Prevention Policy
Department of Homeland Security
Washington, DC

Dear Admiral Thomas:

As Executive Director/CEO of the Maritime & Port Information Sharing & Analysis Organization (MPS-ISAO), the information sharing and analysis organization for the nation's Maritime and Port critical infrastructure, we are pleased to have had the opportunity to review and comment on the Navigation and Vessel Inspection Circular (NVIC) 05-17.

First, we would like to applaud the U.S. Coast Guard's engagement and commitment to the nation's Area Maritime Security Committees. Like you, we advocate, and have adopted, the public- and private-sector partnership model, and believe that through an information sharing and coordinated response infrastructure, and the adoption of best practices supported by role-based education, we can achieve cyber resilience across the Maritime Transportation critical infrastructure.

As background to our comments, the MPS-ISAO co-chaired, and participated in, a Gulf of Mexico (GOM) Cybersecurity Exercise last month (August 2017). The results of this exercise are currently being documented by the Department of Homeland Security, National Cyber Exercise and Planning Program's (DHS NCEPP) team as an After-Action Report (designated TLP-AMBER) and a Summary (TLP-GREEN designation). While these reports are not yet available, the MPS-ISAO would like to highlight two cybersecurity "challenges" that were identified and discussed at length during the exercise's "hotwash" - the risk that 3rd party contractors introduce to MTSA-regulated facilities, and the alignment of cyber and physical response protocols.

Given the potential of harmful consequences that 3rd party contractors (with access to critical cyber systems and networks) can introduce to regulated facilities, the MPS-ISAO believes that it is reasonable for the U.S. Coast Guard's NVIC 05-17 to more specifically address this risk. From the contracting process to the day-to-day operations including sector/cross-sector dependencies, there is an opportunity to introduce best practices to mitigate 3rd party contractor risks and address alignment and coordination of public- and private-sector cyber and physical response protocols to enable an "all-hazards" approach. Please know that during the hotwash, exercise participants expressed a genuine willingness to work together as a trusted community to resolve these cybersecurity challenges. We find this encouraging.





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Furthermore, the MPS-ISAO has committed to being a change agent to advance cyber resilience. During the GOM Cyber Exercise hotwash, we offered to form a working group to develop a cyber template that could be used as a facility security plan annex. Several private sector organizations, along with the U.S. Coast Guard, have offered to participate in this working group, and our hope is that the contribution of existing private-sector assets will expedite the development of this cyber template. The MPS-ISAO will hold a call-for-participation for this project before the end of September, and plan to commence this working group sometime in October.

Just as the maritime and port critical infrastructure exists to serve the needs of U.S. and global economies, defense, transportation, and public health and safety, the MPS-ISAO exists to serve the unique cyber resilience and cyber security needs of maritime and port organizations.

We look forward to continued efforts to support U.S. Coast Guard goals and objectives to enable and ensure maritime and port security and safety. Please feel free to contact me directly to discuss in greater detail.

Best regards,

Deborah L. Kobza, CGEIT, JIEM
Executive Director/CEO

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About MPS-ISAO

Headquartered at the Global Situational Awareness Center (GSAC) at NASA/Kennedy Space Center, the MPS-ISAO is a non-profit organization, private sector-led working in collaboration with government to advance Port and Maritime cyber resilience. The core mission to enable and sustain a safe, secure and resilient Maritime and Port Critical Infrastructure through security situational awareness intelligence, multi-directional information sharing, coordinated response, and best practice adoption supported by role-based education. The MPS-ISAO is a founding member of the International Association of Certified ISAOs (IACI). More information at: www.mpsisao.org.

